

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

CHERYL SAGATAW, DEANTHONY
BARNES, ROBERTA STRONG, and
TRAVIS NELOMS, *on behalf of*
themselves and a class of
similarly-situated individuals,

Civil Action

0:24-cv-00001-ECT/TNL

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his*
individual and official capacity,

**MEMORANDUM IN SUPPORT
OF MOTION TO
AMEND OPERATIVE
COMPLAINT
AND TO ADD PLAINTIFFS**

Defendant.

Plaintiffs Cheryl Sagataw, DeAnthony Barnes, Roberta Strong, and Travis Neloms, and prospective Plaintiffs Alvin Butcher, Adrian Tiger, Chance Askenette, Deven Caston, Lola Hegstrom, and RonDel Applebee, submit the following memorandum of law in support of their Motion to Amend Operative Complaint and Add Plaintiffs.

Federal Rule of Civil Procedure 15(a)(2) allows a party to amend its pleading with the opposing party's written consent. The Motion to Amend and the proffered Second Amended Complaint are submitted with the written consent of the opposing party, as is reflected in the contemporaneously filed Meet and Confer statement.

CONCLUSION

Because the legal standard in Federal Rule 15(a)(2) has been met, the Motion to Amend Operative Complaint and Add Plaintiffs should be granted.

Signed,

Date: September 24, 2024



KIRA A. KELLEY
Climate Defense Project
MN Bar No. 0402932
P.O. Box 7040
Minneapolis, MN 55407
(802) 683-4086
kira@climatedefenseproject.org

Attorney for Plaintiffs